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Attorneys for Proposed Lead Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHRIS BASNETT, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiffs,

-against-

LONGWEI PETROLEUM HOLDING
COMPANY, CAI YOUNGJUN, JAMES
CRANE, AND MICHAEL TOUPS

Defendants.

----- X
JUN MA, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiffs,

-against-

LONGWEI PETROLEUM HOLDING
COMPANY, CAI YONGJUN, JAMES
CRANE, AND MICHAEL TOUPS

Defendants.

----- X

Case No 13 cv 214 (HB) ECF CASE
**RICHARD D. KOZMA'S RESPONSE TO
COMPETING MOTIONS FOR
CONSOLIDATION, APPOINTMENT AS
LEAD PLAINTIFF, AND APPROVAL OF
LEAD PLAINTIFF'S SELECTION OF
COUNSEL**

Case No 13 cv 229 (JPO) ECF CASE

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CHARLIE MUNIZ, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Case No 13 cv 278 (HB) ECF CASE

Plaintiffs,

-against-

LONGWEI PETROLEUM HOLDING
COMPANY, CAI YONGJUN, JAMES
CRANE, AND MICHAEL TOUPS

Defendants.

----- X

PAUL HOWARD, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Case No 13 cv 422 (HB) ECF CASE

Plaintiffs,

-against-

LONGWEI PETROLEUM INVESTMENT
HOLDING COMPANY, CAI YONJUN,
JAMES CRANE, AND MICHAEL TOUPS,

Defendants.

----- X

**RICHARD D. KOZMA’S RESPONSE TO COMPETING MOTIONS FOR
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF
LEAD PLAINTIFF’S SELECTION OF COUNSEL**

Richard D. Kozma (“Mr. Kozma” or “Movant”) respectfully submits this response to the competing motions for appointment as lead plaintiff in the above-captioned action.

Numerous motions for appointment of lead plaintiff are currently pending before the Court. Having reviewed the competing motions, it appears that Mr. Kozma does not possess the “largest financial interest in the relief sought by the class” as required by the Private Litigation Securities Reform Act of 1995 (“PSLRA”). 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(bb). Therefore, Mr. Kozma withdraws his motion for lead plaintiff. However, should the Court find that the

movants claiming the larger financial interests are unwilling or unable to satisfy any of the PSLRA's requirements for appointment as lead plaintiff for any reason, Mr. Kozma stands ready, willing, and able serve as lead plaintiff if called upon by the Court. This response shall have no effect on Mr. Kozma's rights as a member of the proposed class, and Mr. Kozma expressly reserves any and all rights to share in any recovery in this action.

Dated: March 22, 2013

Respectfully submitted,

s/ Michael Eisenkraft
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